

JAMES E. JOHNSON Corporation Counsel

## THE CITY OF NEW YORK LAW DEPARTMENT

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BY ECF

Honorable John G. Koeltl United States District Court Southern District of New York 500 Pearl Street New York, New York 10007 November 1, 2020

APPLICATION GRANTED

SO ORDERED

John G. Koeltt, U.S.D.J.

Re: Bishme Ayers v. City of New York, et al, 14 CV 8979 (JGK)

Your Honor:

I am a Senior Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, assigned to the defense of the above-referenced matter. I write to respectfully request a one-week extension of time for the parties to file their pretrial submissions, including the joint pre-trial order, motions in limine and requests to charge from November 5, 2020 to November 12, 2020. Plaintiff's counsel, Caitlin Robin, Esq., consents to this request. This is defendants' second request for an extension of time to file pre-trial submissions.

Defendants are requesting a one-week extension of time due to the ongoing limitations and impairments caused by the Covid-19 pandemic and the New York City Law Department's continued requirement that the vast majority of its employees work from home,

Accordingly, defendants respectfully request a one-week extension of time for the parties to file their pretrial submissions from November 5, 2020 to November 12, 2020, and a corresponding extension of time for the parties to file responses and objections from November 12, 2020 to November 19, 2020.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Joseph Zangrilli Senior Counsel

Cc: Caitlin Robin, Esq. (Via ECF)

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